

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

UNITED STATES OF AMERICA and	)	
STATE OF WISCONSIN,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 10-C-910
	)	
NCR CORP. and APPLETON PAPERS	)	
INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	

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**DECLARATION OF FRANCIS A. CITERA IN SUPPORT OF  
DEFENDANT P.H. GLATFELTER COMPANY'S RESPONSE TO  
DEFENDANT NCR CORPORATIONS' MOTION *IN LIMINE* TO  
EXCLUDE THE EXPERT TESTIMONY OF GARY KLEINRICHERT**

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I, Francis A. Citera, declare:

1. I am a Shareholder with the law firm of Greenberg Traurig, LLP. I am duly admitted to practice before the United States District Court for the Eastern District of Wisconsin. I am one of the attorneys representing P.H. Glatfelter Company ("Glatfelter") in the above-captioned case. The following facts are within my personal knowledge and, if called as a witness, I could and would testify competently thereto.

2. Glatfelter and certain other defendants have designated Gary Kleinrichert as an expert witness for the December 3, 2012 trial of the above-captioned case.

3. A true and correct copy of Mr. Kleinrichert's initial expert report is attached as **Exhibit 1**.

4. A true and correct copy of Mr. Kleinrichert's supplemental expert report is attached as **Exhibit 2**.

5. A true and correct copy of the transcript of Mr. Kleinrichert's deposition is attached as **Exhibit 3**.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on November 27, 2012, in Chicago, Illinois.

Dated: November 27, 2012

By: /s/ Francis A. Citera  
Francis A. Citera  
David G. Mandelbaum  
Marc E. Davies  
Caleb J. Holmes  
Adam B. Silverman  
GREENBERG TRAURIG, LLP  
Two Commerce Square, Suite 2700  
2001 Market Street  
Philadelphia, PA 19103  
215-988-7800  
citera@gtlaw.com

**Attorneys for Defendant P. H. Glatfelter  
Company**

**CERTIFICATE OF SERVICE**

I, Francis A. Citera, do hereby certify that on this 27<sup>th</sup> day of November, 2012, I caused a copy of **DECLARATION OF FRANCIS A. CITERA IN SUPPORT OF DEFENDANT P.H. GLATFELTER COMPANY'S RESPONSE TO DEFENDANT NCR CORPORATIONS' MOTION *IN LIMINE* TO EXCLUDE THE EXPERT TESTIMONY OF GARY KLEINRICHERT** to be filed electronically via the Electronic Court Filing system and is available for viewing and downloading:

/s/ Francis A. Citera  
Francis A. Citera